

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

IN RE AQUA DOTS PRODUCTS
LIABILITY LITIGATION

MDL No. 1940

Lead Case No. 1:08-cv-2364

Judge David H. Coar

Magistrate Judge Susan E. Cox

THIS DOCUMENT RELATES TO: ALL
ACTIONS

MOOSE ENTERPRISE PTY LTD.'S INITIAL DISCLOSURES

TO ALL PARTIES THROUGH THEIR ATTORNEYS OF RECORD:

Defendant, **MOOSE ENTERPRISE PTY LTD.** (hereinafter "Moose") makes these initial disclosures as required by Federal Rules of Civil Procedure, Rule 26(a)(1) and by agreement of the parties and the Order of the Court on May 16, 2008.

A. Individuals with Discoverable Information

The names, addresses, and telephone numbers of individuals likely to have discoverable information that Moose may use to support its claims or defenses are:

- Emily Aguilera, Moose Enterprise Pty Ltd., 7-13 Ardena Court, East Bentleigh, Victoria, 3165, Melbourne, Australia, (613) 959797377
- Rachelle Austen, Moose Enterprise Pty Ltd., 7-13 Ardena Court, East Bentleigh, Victoria, 3165, Melbourne, Australia, (613) 959797377
- Donna Byrne, Moose Enterprise Pty Ltd., 7-13 Ardena Court, East Bentleigh, Victoria, 3165, Melbourne, Australia, (613) 959797377
- Cyril Lam, Moose Enterprise Pty Ltd., 7-13 Ardena Court, East Bentleigh, Victoria, 3165, Melbourne, Australia, (613) 959797377
- Haley Maiden, Moose Enterprise Pty Ltd., 7-13 Ardena Court, East Bentleigh, Victoria, 3165, Melbourne, Australia, (613) 959797377
- Christie Nicholas, Moose Enterprise Pty Ltd., 7-13 Ardena Court, East Bentleigh, Victoria, 3165, Melbourne, Australia, (613) 959797377
- Stephen O'Neill, Moose Enterprise Pty Ltd., 7-13 Ardena Court, East Bentleigh, Victoria, 3165, Melbourne, Australia, (613) 959797377
- Joost Poulos, Moose Enterprise Pty Ltd., 7-13 Ardena Court, East Bentleigh, Victoria, 3165, Melbourne, Australia, (613) 959797377
- Esther Skliros, Moose Enterprise Pty Ltd., 7-13 Ardena Court, East Bentleigh, Victoria, 3165, Melbourne, Australia, (613) 959797377

- Paul Solomon, Moose Enterprise Pty Ltd., 7-13 Ardena Court, East Bentleigh, Victoria, 3165, Melbourne, Australia, (613) 959797377
- Manny Stul, Moose Enterprise Pty Ltd., 7-13 Ardena Court, East Bentleigh, Victoria, 3165, Melbourne, Australia, (613) 959797377
- Jacqui Tobias, Moose Enterprise Pty Ltd., 7-13 Ardena Court, East Bentleigh, Victoria, 3165, Melbourne, Australia, (613) 959797377
- Adam Woods, Moose Enterprise Pty Ltd., 7-13 Ardena Court, East Bentleigh, Victoria, 3165, Melbourne, Australia, (613) 959797377
- Anita Choy, Moose Far East, Suite 720, 7/Fl., Chinachem Golden Plaza, 77 Mody Road, TST East, Kowloo, Hong Kong
- Clark Lam, Moose Far East, Suite 720, 7/Fl., Chinachem Golden Plaza, 77 Mody Road, TST East, Kowloo, Hong Kong
- Lisa Lo, Moose Far East, Suite 720, 7/Fl., Chinachem Golden Plaza, 77 Mody Road, TST East, Kowloo, Hong Kong
- Sam Tsang, Moose Far East, Suite 720, 7/Fl., Chinachem Golden Plaza, 77 Mody Road, TST East, Kowloo, Hong Kong
- Derek Wong, Moose Far East, Suite 720, 7/Fl., Chinachem Golden Plaza, 77 Mody Road, TST East, Kowloo, Hong Kong
- Julius Yeung, Moose Far East, Suite 720, 7/Fl., Chinachem Golden Plaza, 77 Mody Road, TST East, Kowloo, Hong Kong
- Peter Mahon, Royce Pty Ltd., 43/55 Collins Street, Melbourne, Australia, (613) 9639 2300
- Michael Horkings, Royce Pty Ltd., 43/55 Collins Street, Melbourne, Australia, (613) 9639 2300

Each of these listed individuals are an employee of Moose or its subsidiaries and may be contacted through Moose's counsel of record, Clinton & Clinton.

B. Relevant Documents, Electronically Stored Information & Tangible Things

Attached are copies of the documents in Moose's possession, custody or control that Moose may use to support its claims or defenses. Additional documents, as listed in the below paragraphs, may also be relied upon by Moose.

Additionally, Moose is currently in the process of collecting all relevant electronic data from its electronic information systems. The parties are currently in discussions regarding electronic data and how it must be produced.

The following is a list of documents, electronically stored information, and tangible things in Moose's possession, custody, or control, described by category and location, that Moose may use to support its claims or defenses:

- Samples of one of each type of Aqua Dots toy produced

C. Information Related to Calculation of Damages

At this time, Moose has no information relating to the computation of damages. Should any documents be discovered as electronic data is collected and reviewed, said data will immediately be produced to all parties.

D. Insurance

All insurance agreements required to be disclosed are attached.

Dated: June 16, 2008

Respectfully submitted,

MOOSE ENTERPRISE PTY LTD.

By: 

CLINTON & CLINTON

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ATTORNEYS FOR
DEFENDANT, MOOSE ENTERPRISE
PTY LTD.

CERTIFICATE OF SERVICE

I, Catherine M. Cruz, certify that on June 16, 2008 I sent a copy of the attached **MOOSE ENTERPRISE PTY LTD.'S INITIAL DISCLOSURES** to all parties via the United States District Court's E-Filing System.


CATHERINE CRUZ